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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

RE:	:	CHAPTER 13
JOSEPH & MARIANNE FORD	:	CASE NO.: 14-34442 ABA
Debtors	:	MOTION TO REDUCE PROOF OF
	:	CLAIM OF WELLS FARGO AND
	:	DETERMINE ESCROW RESPONSIBILITY
	:	

PLEASE TAKE NOTICE that on the 29th day of March, 2016, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorney for the debtors, Joseph and Marianne Ford, will move before the United States Bankruptcy Court, at the Mitchell H. Cohen US Courthouse, 400 Cooper Street, 4th Floor, Camden, New Jersey 08101, Courtroom 4B, for an Order to Reduce the Proof of Claim of Wells Fargo and Determine Escrow Responsibility.

PLEASE TAKE FURTHER NOTICE that if you wish to contest the within Motion, you must file with the Office of the Clerk of the Bankruptcy Court and serve the undersigned within ten (10) days in advance of the aforesaid hearing, responding papers stating with particularity the basis of your opposition to the within Motion.

(X) A copy of the proposed Order which is sought is enclosed with this Motion.

(X) In support of the aforesaid Motion, the attorney for said plaintiff will rely upon the Certification attached hereto and made a part thereof.

March 4, 2016
DATE

/s/ Lee M. Perlman
LEE M. PERLMAN, ESQUIRE